

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**RALPH S. JANVEY, in his capacity as  
Court-appointed receiver for the Stanford  
Receivership Estate; the OFFICIAL  
STANFORD INVESTORS COMMITTEE**

**Plaintiffs,**

**v.**

**IMG WORLDWIDE, INC. and  
INTERNATIONAL PLAYERS  
CHAMPIONSHP, INC.,**

## Defendants.

§§

**CIVIL ACTION NO.**  
**3:11-cv-00117-N**

**(Consolidated with  
Case No. 3:11-00293-N)**

**MOTION TO WITHDRAW**

Pursuant to Local Rule 83.12, Plaintiffs Ralph S. Janvey, in his capacity as Court-appointed receiver for the Stanford Receivership Estate; the Official Stanford Investors Committee file this motion for Nicholas A. Foley to withdraw as counsel for the Plaintiffs. Mr. Foley is an attorney, formerly with the law firm of Neligan Foley LLP (“Neligan”) and has represented the Plaintiffs in connection with his employment at Neligan. Mr. Foley has retired from the practice of law effective August 31, 2014. Thus, the Plaintiffs request that this Court enter an order removing Mr. Foley as counsel of record for the Plaintiffs effective as of the same date.

The other attorneys at Neligan Foley LLP, along with attorneys at Castillo Snyder, P.C., Strasburger & Price, LLP, Butzel & Long, and Baker Botts LLP, who have made appearances in this case, will continue representing the Plaintiffs. Accordingly, Mr. Foley's withdrawal from the case will not cause undue delay or prejudice to any party.

Dated: October 1, 2014

Respectfully submitted,

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**COUNSEL FOR PLAINTIFFS**

**CERTIFICATE OF CONFERENCE**

Counsel for the Plaintiff has attempted to confer with counsel for Defendants, via email at the email address(es) reflected on the Court's docket, on September 24, 2014, allowing sufficient time for a response and have received no response or objection to the granting of the relief requested herein.

/s/ Douglas Dunn  
Douglas Dunn

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system pursuant to the Court's Local Rules this 1<sup>st</sup> day of October, 2014. All other counsel will be served by United States mail, certified mail/return receipt requested.

/s/ Douglas Dunn  
Douglas Dunn